

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **DATE FILED:** _____
v. : **CRIMINAL NO.** _____
GARY WHITE : **VIOLATIONS:**
18 U.S.C. § 1341 (mail fraud - 3 counts)

INFORMATION

COUNTS ONE THROUGH THREE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times relevant to this information:

1. Defendant GARY WHITE was employed as a professor at Eastern College in St. Davids, Pennsylvania, and as an adjunct faculty member at Bucks County Community College in Newtown, Pennsylvania.
2. Defendant GARY WHITE participated in an Independence Blue Cross (“Blue Cross”) health insurance plan offered by Bucks County Community College, and an Aetna Health Inc. plan (“Aetna”) offered by Eastern College.
3. Both the Blue Cross health insurance plan and the Aetna health insurance plan carried by defendant GARY WHITE included prescription drug benefits.
4. The Blue Cross prescription drug plan was administered by various Blue Cross affiliates, including Caremark, Medco Health Solutions, Inc., Paid Prescriptions, LLC, and Advance PCS, which entities processed the claims and issued payments, and were reimbursed by Blue Cross.

5. Under defendant GARY WHITE's prescription drug plans, he could elect to pay for the prescription and submit a direct claim for reimbursement, or pay the pharmacy the co-payment only and have the pharmacy submit the reimbursement claim.

THE SCHEME

6. From in or about January 2001, through in or about July 2005, defendant

GARY WHITE

devised and intended to devise a scheme to defraud Aetna and Blue Cross, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

It was part of the scheme that:

7. Defendant GARY WHITE created false pharmacy receipts for various prescription drugs by altering actual receipts for legitimate prescriptions that WHITE had previously submitted to his health insurers.

8. Defendant GARY WHITE submitted the false prescription receipts to Blue Cross and Aetna, claiming that he had paid the pharmacy for the prescriptions, and requesting reimbursement for the full cost of the prescriptions.

9. Defendant GARY WHITE fraudulently obtained approximately \$70,800 from Blue Cross and approximately \$6,500 from Aetna through the submission of false prescription claims.

10. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

GARY WHITE

for the purpose of executing this scheme, knowingly caused to be delivered by the United States mail, according to the instructions thereon, to defendant GARY WHITE in Bensalem, Pennsylvania, checks issued by the entities listed below and made payable to GARY WHITE as follows:

Count	Payor	Amount and Date of Check	Mailing Address of Payor
1	Paid Prescriptions, LLC	12/15/01, \$1,101.10	399 Jefferson Rd Parsippany, NJ 07054
2	Medco Health Solutions, Inc.	1/18/04, \$966.90	399 Jefferson Rd Parsippany, NJ 07054
3	Aetna Pharmacy Management	5/11/04, \$1,097.74	11100 Wayzata Blvd Minnetonka, MN 55305

All in violation of Title 18, United States Code, Section 1341.

PATRICK L. MEEHAN
UNITED STATES ATTORNEY